

Sarai L. Thornton, Esq. (Bar No. 11067)  
[sthornton@skanemills.com](mailto:sthornton@skanemills.com)  
SKANE MILLS LLP  
1120 Town Center Drive, Suite 200  
Las Vegas, Nevada 89144  
(702) 363-2535  
(702) 363-2534 Fax  
*Counsel for Trans Union LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

INNOCENT NGWA,  
Plaintiff,  
v.  
TRANSUNION LLC,  
Defendant.

Case No. 2:24-cv-00285-RFB-MDC

**JOINT STIPULATION AND ORDER  
EXTENDING TIME TO FILE  
STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER  
(FIRST REQUEST)**

Plaintiff Innocent Ngwa (“Plaintiff”) and Defendant Trans Union LLC (“Trans Union”) (collectively, the “Parties”), by and through their respective counsel, file this Joint Stipulation Extending Time to File Stipulated Discovery Plan and Scheduling Order and would respectfully show the Court as follows:

1. On or about January 5, 2024, Innocent Ngwa (“Plaintiff”) filed his Complaint (“Complaint”) in the Justice Court, Township of Las Vegas, Clark County, Nevada, Case No. 24A000022 (“State Court Action”) alleging violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*, against Trans Union.

2. Trans Union LLC was served with Plaintiff’s Complaint on January 10, 2024. On February 8, 2024, Trans Union filed a Notice of Removal and removed the case to this Court. (Dkt. 1).

3. Plaintiff filed a Motion to Remand on February 13, 2024 (Dkt. 7) and Trans Union filed its Response to the Motion to Remand on February 27, 2024 (Dkt. 11). Plaintiff filed his Reply in Support of the Motion to Remand on March 14, 2024 (Dkt. 16).

1           4.       Trans Union filed its Answer to Plaintiff's Complaint on February 16, 2024,  
2 making the deadline to file the Stipulated Discovery Plan and Scheduling Order April 1, 2024  
3 (Dkt. 8).

4           5.       Good cause exists for the Parties' request for an extension to file their Stipulated  
5 Discovery Plan and Scheduling Order. The Parties agree that filing the Stipulated Discovery  
6 Plan and Scheduling Order is premature until the Court rules on Plaintiff's Motion to Remand.  
7 Therefore, it is appropriate to extend the deadline for the Parties to file their Stipulated Discovery  
8 Plan and Scheduling Order.

9           6.       The Parties therefore request to extend the deadline to file their Stipulated  
10 Discovery Plan and Scheduling Order until 7 days after the Court rules on Plaintiff's Motion to  
11 Remand, if the Court decides this case should remain in the United States District Court for the  
12 District of Nevada. This is the first stipulation for extension of time of this deadline.

13  
14 Dated this 1st day of April 2024.

15                               SKANE MILLS LLP

16                               /s/ Sarai L. Thornton

17                               Sarai L. Thornton, Esq. (Bar No. 11067)  
18                               1120 Town Center Drive, Suite 200  
19                               Las Vegas, Nevada 89144  
                                  *Counsel for Trans Union LLC*

20                               /s/ Innocent Ngwa

21                               Innocent Ngwa  
22                               1813 Pinsky Lane  
23                               North Las Vegas, NV 89032  
24                               *Pro Se Plaintiff*

**ORDER**

The Joint Stipulation for Extension of Time to File Stipulated Discovery Plan and Scheduling Order is so ORDERED AND ADJUDGED.

Dated this 4th day of April, 2024.

  
\_\_\_\_\_  
**UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of April 2024, I filed **JOINT STIPULATION AND ORDER EXTENDING TIME TO FILE STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel:

None.

I hereby certify that I have served the above and foregoing document to the following non-CM/ECF participants via email:

Innocent Ngwa  
[ingwa6227@gmail.com](mailto:ingwa6227@gmail.com)  
1813 Pinsky Lane  
North Las Vegas, NV 89032  
(240) 462-2637  
*Pro Se Plaintiff*

/s/ Pouneh Porooshani  
Pouneh Porooshani